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December 7, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *John “Jack” Yang v. The Bank of New York Mellon Corp., et al.*,  
Case No. 1:20-cv-03179 (AJN)

Dear Judge Nathan:

We respectfully submit the attached proposed Stipulation of Confidentiality and Protective Order (hereafter, the “Protective Order”) on behalf of all parties.

Thank you for Your Honor’s consideration of this submission.

Respectfully submitted,

/s/ Manisha M. Sheth  
Manisha M. Sheth

cc: Counsel of Record for Defendants